Dear FCC,

Regarding the Notice of Inquiry in ET Docket 03-104, I am extremely opposed to the implementation of BPL "Broadband over Power Line" technology. This alone would cause severe damage to the existing amateur radio service, especially in the HF-VHF regions of the spectrum, not to mention to several existing commercial services. I being a licensed extra class amateur radio operator

callsign W2CO, as well as a commercially licensed GROL# PG-GB-029372 with ship radar

endorsement, am strongly against this proposal.

Here are some of my arguments:

- *Amateur Radio is a valuable resource that must be protected, especially in the HF bands. Other services like Police VHF, Fire VHF, Marine HF-VHF, and aeronautical VHF are also in danger of harmful interference directly from this proposed technology.
- *BPL systems that radiate on wide swaths of spectrum and that occupy entire neighborhoods have far greater interference potential to existing services than

localized systems, such as switching power supplies, electric motors, spread spectrum telephones, etc. Just the 2.4Ghz spread spectrum phones and wireless cameras that are in use today cause havoc with some satellite frequencies already in use, and these are well above the HF spectrum.

*With proposed BPL, the HF spectrum will be rendered useles, and the harmonics

thereof would reach up into the VHF, UHF, and even microwave spectrum assuming

the proposed higher power levels and the lossy power grid system today.

- *The FCC has promised to protect licensed users of these spectrum, it must execute this responsibility.
- *There are already many ways to get broadband internet connections with proven

technologies like cable modems which use carefully prepared and tested closed

circuit cables, fiber optic systems which have blazingly high bandwidth and

RF quiet, satellite access which is also very good, DSL, T1, ISDN etc. Most home users today are still using dial up modems over the telephone lines.

This seems adequate for most users, and studies have shown that only about 30 to 35% of internet users in america use broadband even if available to them.

 $\mbox{{\tt *If}}$ you have had any experience with the power companies, you will know that they cannot

handle even the most simple problems with noise, if at all respond. If they start to

provide BPL technology, they will be way over their heads as far as being able to cope

with the interference complaints. And will probably not even respond, not to mention the interference hams will generate into this system. The companies said

that a HF station transmitting only 1W EIRP anywhere from 1-30MHZ would cause harmful

interference to this system. It's a vicious two way street here.

HF-VHF bands would be ruined as far as hams using them, and the harmonics of the BPL

system would reach all the way up into the GHZ ranges because of the increased power

levels they propose. Power lines were not designed to carry HF-VHF frequencies,

they were designed to carry 60hz AC! And they can hardly do that very well with all

the lossy insulators etc etc. Imagine the noise levels this lossy system of wires all

over the country would cause. Lets face it, Broadband Over Power Lines is a very bad

idea for ham radio as we know it. Japan has already BANNED any use of this system,

even with low power levels. They have tested it along with some european countries now,

and all have had very bad results for ham radio's ${\tt HF-VHF}$ bands! Why should we let ham

radio be ruined just because some money hungry companies say it's great for business???

I used to work at TI, one of the companies who helped designed this system, and they

knew it would interfere with many services, but continued the design anyway because

it was big revenue potential!

I propose that BPL technology be barred from operating freely on any power lines,

and that any such service should it be passed, be strictly monitored for proper emission

and radiation standards, and that power company service personnel be FCC licensed and

properly trained in ${\tt EMI/RFI}$ issues and remedies. Any harmful interference caused by

licensed services to said service should be allowed as per part 15 of the FCC rules.

Regards, Thomas M. Walsh ARS W2CO GROL PG-GB-029372